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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

Trustees of the Plumbers and Pipefitters Union
Local 525 Health and Welfare Trust and Plan;
Trustees of the Plumbers and Pipefitters Union
Local 525 Pension Plan; and the Trustees of the
Plumbers and Pipefitters Local Union 525
Apprentice and Journeyman Training Trust for
Southern Nevada,

Plaintiffs

vs.

Juan Carrilio Sotelo dba Sotelo Air; Sotelo Air,
Inc., dba Cool Air Now; Aegis Security Insurance
Company, a Pennsylvania corporation; American
Safety Casualty Insurance Company, a Georgia
corporation,

Defendants.

Trustees of the Plumbers and Pipefitters National
Pension Fund and International Training Fund,
Plaintiffs,

vs.

Juan Carrilio Sotelo dba Sotelo Air; Sotelo Air,
Inc. dba Cool Air Now; Juan Carrilio Sotelo,
an individual; Now Services of Nevada, LLC dba
Cool Air Now, a Nevada limited liability
company; Now Services of Nevada, LLC dba
Plumbing Repair Now, a Nevada limited liability
company; Western National Mutual Insurance
Company, a surety company; John Does I-X and
Roe Corporations I-X, inclusive,

Defendants.

Case No.: 2:13-CV-00657-RFB-NJK

CONSOLIDATED WITH:

Case No.: 2:14-cv-01609-JAD-CWH

STIPULATION TO EXTEND TIME
TO RESPOND TO DEFENDANTS'
FRCP 12(B)(6) MOTION TO DISMISS
PLAINTIFFS' AMENDED
COMPLAINT

(FIRST REQUEST)

Date: N/A

Time: N/A

1 The Plaintiffs, Plumbers and Pipefitters National Pension Fund and International Training
 2 Fund ("National Funds"), by and through their Counsel, Christensen James & Martin and
 3 Defendants Juan Carrillo Sotelo dba Sotelo Air, Sotelo Air, Inc. dba Cool Air Now and Juan
 4 Carrillo Sotelo ("Defendants") by and through their Counsel, Law Offices of Michael F. Bohn,
 5 Esq., Ltd., hereby Agree and Stipulate that the National Funds shall have through and including
 6 Tuesday, October 27, 2015, to file and serve its Responsive Pleading to Defendants' FRCP
 7 12(b)(6) Motion to Dismiss Plaintiffs' Amended Complaint (Doc. 85) on file herein. This
 8 Stipulation is entered at the request of Counsel for the National Funds, and is not entered for the
 9 purpose of causing unnecessary delay, but rather is made necessary to allow the National Funds
 10 additional time to analyze the Motion and prepare a Response.

12 Christensen James & Martin

Law Offices of Michael F. Bohn, Esq., Ltd.

14 By: /s/ Laura J. Wolff
 15 Laura J. Wolff, Esq.
 16 Attorneys for National Funds

By: /s/ Michael F. Bohn
 Michael F. Bohn, Esq.
 Attorneys for Defendants

17 Dated: October 21, 2015.

Dated: October 21, 2015.

18 **IT IS SO ORDERED.**

19 

20
 21 RICHARD F. BOULWARE, II
 22 United States District Judge

23 Dated: October 26, 2015.

